

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
GALVESTON DIVISION

United States Courts
Southern District of Texas
FILED

NOV 13 2023

Nathan Ochsner, Clerk of Court

IN RE: § Case No: 23-80179
§ (Chapter 7)
Don J. Knabeschuh §
Movant's Counsel §

MOTION TO RECONSIDER ORDER GRANTING
RELIEF FROM AUTOMATIC STAY
(Docket #25)

On or about 1st week of November 2023, I received a notice in the mail from the Honorable Jeffrey P. Norman, ordering a grant of relief from automatic stay to Credit Human Federal Credit Union, regarding 2019 Toyota Sienna minivan, filed by the Movant's Counsel referenced above. This order of the judge came as a surprise, as I was unaware that a motion had been filed to seek relief by Don J. Knabeschuh. I do not recall receiving any notifications regarding this motion until the order of judgment was received at my residence.

Statements of fact: To date I have received no notifications of this motion, therefore have not had a fair opportunity to oppose, additionally I have received no notifications of any hearing regarding this topic as per suggested in the order. That said, I argue that the Movant's motion **WAS NOT** in accordance with applicable bankruptcy rules, as if I would have had a fair opportunity to oppose, I would have indeed done so.

Finally, the vehicle in reference, is a primary vehicle that is used to transport my children and spouse to school where they attend to duly teach, and get their primary education. Allowing the creditor to foreclose on the property prematurely, will put my family in a situation where the children can not go to school, my spouse can not go to work, creating a situation that is even more dire than current.

My original 341 meeting was granted a continuation from Nov 2, 2023 , 2023 to Nov 21, 2023. In a few short weeks, the assigned trustee will make her recommendation on how to handle the outstanding debt. For all reasons listed, I am pleading to the honorable judge to reconsider the lifted stay of relief order and allow the stay to continue for longer, until a recommendation is made, so that my family can make a plan for necessary transportation based on the final judgment of the court.

Justin A. Hicks
2106 Cherry Hills Drive
Debtor
pro se

11/13/2023

